

**LOCAL BANKRUPTCY FORM 9014-3  
IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Rosalind Parrish	Debtor(s)	CHAPTER 13
PENNSYLVANIA HOUSING FINANCE AGENCY	Movant	
vs.		
Rosalind Parrish	Debtor(s)	NO. 22-10383 AMC
Kenneth E. West	Trustee	11 U.S.C. Section 362

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

PENNSYLVANIA HOUSING FINANCE AGENCY has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion, then on or before **February 14, 2023** you or your attorney must do all of the following:

- (a) file an answer explaining your position at:  
United States Bankruptcy Court  
Robert N.C. Nix Building  
900 Market Street, Suite 400  
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to movant's attorney:  
Bankruptcy Group  
KML Law Group, P.C.  
Suite 5000 - BNY Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan, the United States Bankruptcy Judge, in Courtroom 4 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, Pa. 19107-4299 on **March 7, 2023**, at **11:00am**, or as soon thereafter as counsel can be heard, to consider the motion.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).



5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

/s/ Denise Carlon, Esq.

---

Denise Carlon, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106-1532  
Phone: (215) 627-1322 Fax: (215) 627-7734  
Attorneys for Movant/Applicant

January 31, 2023



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Rosalind Parrish  Debtor(s)  PENNSYLVANIA HOUSING FINANCE AGENCY Movant  vs.  Rosalind Parrish  Debtor(s)  Kenneth E. West  Trustee		CHAPTER 13       NO. 22-10383 AMC       11 U.S.C. Section 362
---	--	---

**CERTIFICATE OF SERVICE**

I, Denise Carlon, Esq., attorney for Movant, do hereby certify that I caused true and correct copies of the foregoing Motion of PENNSYLVANIA HOUSING FINANCE AGENCY for Relief From Automatic Stay and NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE to be served on January 31, 2023, by first class mail, and/or electronic means upon those listed below:

Debtor(s)  
Rosalind Parrish  
916 East Upsal Street Unit A  
Philadelphia, PA 19150

Attorney for Debtor(s)  
Zachary Perlick, Esq.  
1420 Walnut Street, Suite 718  
Philadelphia, PA 19102  
**VIA ECF**

Trustee  
Kenneth E. West  
Office of the Chapter 13 Standing Trustee (VIA ECF)  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107  
**VIA ECF**

Office of the US Trustee  
United States Trustee – **VIA ECF**  
Office of the U.S. Trustee  
Robert N.C. Nix Federal Building  
900 Market Street Suite 320  
Philadelphia, PA 19107

Date: January 31, 2023

/s/ Denise Carlon, Esq.

---

Denise Carlon, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106-1532  
Phone: (215) 627-1322 Fax: (215) 627-7734  
Attorneys for Movant/Applicant